

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :  
 :  
Plaintiffs, :  
 :  
v. : C.A. No. 05-823-\*\*\*  
 :  
STANLEY TAYLOR, et al., :  
 :  
Defendants. :

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS  
TO DEPOSE DEFENDANT JOSEPH ADKINS

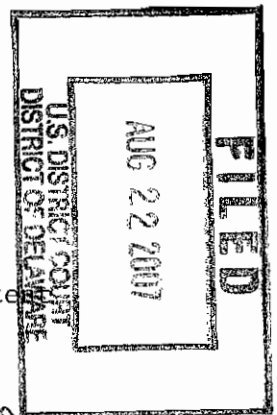
Plaintiff George A. Jackson, pro se, hereby depose defendant upon  
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the extent  
of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of  
Corrections?
2. Are you under the influence of any medication?
3. Have you had a chance to review the Amended Complaint, your "Response  
to Plaintiffs' Interrogatories", and any previous statements you given  
to defendants' counsel or any one else in connection with this case before  
coming here today?
4. Have you had a chance to meet and discuss the case with defendants'  
counsel?
5. Do you realize that you are under oath, just as if you were at  
trial testifying?
6. Is there any reason you can't give your best testimony today?



7. State your job title, and explain your general duties.

8. On July 20, 2005, an inmate reportedly found a parasite (larva) in his Beef Cube Steak, in which you carried out the investigation which included an inspection of the kitchen area. After your findings, was any replacement vermin control equipment such as bug lights ordered for the kitchen area?

9. Did "Going Clean" Pressure Washing Company steam clean the exhaust hood system at the kitchen ~~before~~ before the filing of George A. Jackson's July 19, 2005 grievance, or after the filing of this December 1, 2005, Civil Action Complaint?

10. Do you agree or disagree. When a person is working under conditions that exhibits excessive heat and high humidity, a person's body works at a much higher stress level due to the lack of oxygen in the air?

11. Since you have worked at the SCI main kitchen, when an inmate complains of any illness, does the SCI food service staff diagnose the inmate, or is he referred to the medical unit to be examined by the proper authorized personnel?

12. When inmate kitchen workers were housed in the air conditioned cool Merit building, if they refused to work or get fired, would that inmate receive a major disciplinary report (class I), and immediately be moved to a less desirable building.

13. Have you ever completed any accredited program on food safety, personal hygiene, preparation, cooking, proper cleaning and sanitizing before July 1, 2005? If yes, please state the name of the accredited program and the date of completion.

14. Are you aware there is only one (1) toilet seat for 22 to 25 inmate workers to use, which forces workers to wait long periods, or even relieving themselves in the floor drains located in the tray room area?

15. Have you ever recorded the air temperature on the "old" side kitchen area?